



C O R P O R A T I O N S E R V I C E C O M P A N Y®

SLM / ALL

Transmittal Number: 11682300
Date Processed: 10/07/2013

Notice of Service of Process

Primary Contact: Pamela Hoff
The Travelers Companies, Inc.
385 Washington Street, MC 515A
Saint Paul, MN 55102

Entity: Travelers Casualty Insurance Company of America
Entity ID Number 2317367

Entity Served: Travelers Casualty Ins. Co. Of America

Title of Action: Reverend Walter Womack vs. Travelers Casualty Insurance Company

Document(s) Type: Summons/Complaint

Nature of Action: Contract

Court/Agency: Shelby County Chancery Court, Tennessee

Case/Reference No: CH-13-1409-1

Jurisdiction Served: Tennessee

Date Served on CSC: 10/07/2013

Answer or Appearance Due: 30 Days

Originally Served On: Dept of Ins-TN on 10/02/2013

How Served: Certified Mail

Sender Information: Lewis K. Garrison, Sr.
901-527-6445

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

CSC is SAS70 Type II certified for its Litigation Management System.

2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscinfo.com

**STATE OF TENNESSEE
Department of Commerce and Insurance
500 James Robertson Parkway
Nashville, TN 37243-1131
PH - 615.532.5260, FX - 615.532.2788
Jerald.E.Gilbert@tn.gov**

October 2, 2013

Travelers Casualty Ins. Co. Of America
2908 Poston Avenue, # C S C
Nashville, TN 37203
NAIC # 19046

Certified Mail
Return Receipt Requested
7012 1010 0002 9210 2022
Cashier # 11193

Re: Reverend Walter Womack, Et Al V. Travelers Casualty Ins. Co. Of America
Docket # CH-13-1409-1

To Whom It May Concern:

Pursuant to Tennessee Code Annotated § 56-2-504 or § 56-2-506, the Department of Commerce and Insurance was served October 2, 2013, on your behalf in connection with the above-styled proceeding. Documentation relating to the subject is herein enclosed.

Jerald E. Gilbert
Designated Agent
Service of Process

Enclosures

cc: Chancery Court Clerk
Shelby County
140 Adams Street, Rm 308
Memphis, Tn 38103

~~CIRCUIT CHANCERY COURT OF TENNESSEE~~
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

SUMMONS IN CIVIL ACTION

Docket No. CH-13-1409-1

- Lawsuit
 Divorce

Ad Damnum \$ 450,000

Reverend Walter Womack and
Faithful Baptist Church

Travelers Casualty Insurance Company

VS

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

Travelers Casualty Insurance Company
Travelers Service Center
P. O. Box 1564
Elmira, NY 14902-1564 by serving the Commissioner of Insurance for the State of Tennessee

Method of Service:

- Certified Mail
 Shelby County Sheriff
 Commissioner of Insurance (\$)
 Secretary of State (\$)
 Other TN County Sheriff (\$)
 Private Process Server
 Other

(\$) Attach Required Fees .

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Plaintiff's attorney, whose address is 145 Court Ave., Suite 402, Memphis, TN 38103 , telephone S27-6445 within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TESTED AND ISSUED

Sept. 17, 2013

By

Jennifer Stael

D.C.

TO THE DEFENDANT:

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a four thousand dollar (\$4,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

JIMMY MOORE / DONNA RUSSELL, Clerk of the Court,
Shelby County, Tennessee, certify this to be a true and
accurate copy as filed this

JIMMY MOORE, Clerk / DONNA RUSSELL, Clerk and Master

By: _____, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the _____ day of _____, 20____ at _____ M. a copy of the summons

and a copy of the Complaint to the following Defendant _____

at _____

By:

Sheriff or other authorized person to serve process

Signature of person accepting service

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:

To the named Defendant _____ because _____ is (are) not to be found in this County after diligent search and inquiry for the following

reason(s): _____

This _____ day of _____, 20_____.

By:

Sheriff or other authorized person to serve process

IN THE CHANCERY COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

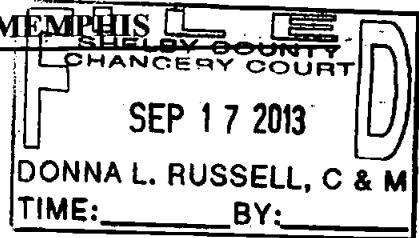
REVEREND WALTER WOMACK and
FAITHFUL BAPTIST CHURCH,

Plaintiffs,

vs.

TRAVELERS CASUALTY INSURANCE
COMPANY,

Defendant.



No.: C4-13-1409-1
Part

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiffs, Reverend Walter Womack and Faithful Baptist Church, and
sues the named Defendant, Travelers Casualty Insurance Company, for damages and alleges as
follows:

I.

Plaintiff, Reverend Walter Womack is the pastor of Faithful Baptist Church and Faithful
Baptist Church is located at 1580 Ely Street in Memphis, Tennessee; that Travelers Casualty
Insurance Company is in the business of casualty insurance coverage for buildings insuring
against fire and wind damage; that Plaintiffs purchased an insurance policy with Defendant,
Travelers Casualty Insurance Company covering damages to the Faithful Baptist Church; that
Plaintiffs allege that Defendant represented to them that the policy was an "all risk" policy
covering all losses that the Plaintiff might suffer; that said premiums were current with the
Defendant.

III.

Plaintiff further alleges that the Defendant has failed to provide any reasonable cause or excuse for not paying this claim; that proper notice was given and the Defendant has failed to properly investigate this claim and refused to pay for the loss as clearly indicated in the insurance policy that was issued in this matter.

IV.

Plaintiffs further allege that they have suffered a loss of use of their building and suffered a loss of income as a church because of the damage they suffered during the loss, as indicated; that Plaintiffs have been deprived of the use of their property due to the loss.

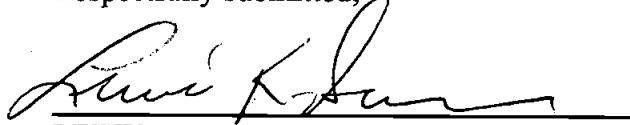
Plaintiffs sue the Defendant for bad faith, breach of contract, failure to properly inspect the property, fraud, and failure to return the premium that was paid for the insurance coverage resulting in a loss and damage to the property, loss of use of this building, and loss of membership.

V.

Plaintiffs further sue the Defendant for punitive damages for the failure to pay for the loss suffered by the Plaintiffs without any reasonable basis for said denial.

WHEREFORE, Plaintiffs sue the Defendant, Travelers Casualty Insurance Company, for the total sum of Four Hundred Fifty Thousand Dollars (\$450,000.00) for actual, compensatory, and punitive damages and demands a judgment when the issues herein are adjoined.

Respectfully submitted,



LEWIS K. GARRISON, SR. (#8311)

Attorney for Plaintiffs

145 Court Avenue, Suite 402

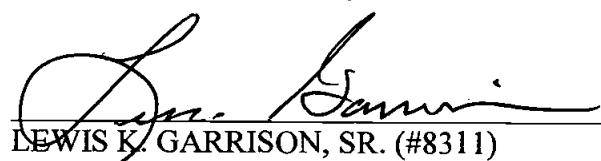
Memphis, TN 38103

(901) 527-6445

(901) 465-8899 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon opposing counsel and via U. S. mail, postage prepaid on this the 11th day of September, 2013.



LEWIS K. GARRISON, SR. (#8311)

CERTIFIED MAIL™

Case 2:13-cv-02827-JTF-tmp Document 1-2 Filed 10/23/13 Page 8 of 8 PageID 13

State of Tennessee
Dept. of Commerce & Insurance
Service of Process
500 James Robertson Parkway
Nashville, TN 37243



7012 1010 0002 9210 2022

FIRST CLASS



7012 1010 0002 9210 2022 10/02/2013
TRAVELERS CASUALTY INS. CO. OF AMERICA
2908 POSTON AVENUE, % CSC
NASHVILLE, TN 37203

37203\$1312.C025

